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Attorney for Creditor Pierre Bernard

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Case No.: 09-14398 (AJG)

CABRINI MEDICAL CENTER,

NOTICE OF MOTION

Debtor.

SIRS:

PLEASE TAKE NOTICE upon the annexed Affirmation of FRANK L.

PELLEGRINI, ESQ., the Memorandum of Law in Support thereof and the exhibits attached thereto, and upon all the proceedings heretofore had herein, a Motion will be made by Plaintiff Pierre Bernard, before Honorable Judge Arthur J. Gonzalez at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408 on September 23, 2009 at 10:00 a.m. in the forenoon of that day, or as soon thereafter as counsel may be heard, for an Order pursuant to 11 U.S.C. §362(d)(1) of the Bankruptcy Code, granting Plaintiff Pierre Bernard's motion for relief from the automatic stay held against his Medical Malpractice action by Cabrini Medical Center.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are required to be served upon the undersigned within ten (10) days of the date of this notice.

Dated: New York, New York
September 11, 2009

Yours, etc.,

PELLEGRINI & ASSOCIATES, LLC
/s/ Frank L. Pellegrini

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